

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	
)	
Phase II Compliance Deadlines for)	
Non-Nationwide CMRS Carriers)	

To: Chief, Wireless Telecommunications Bureau

**REPLY COMMENTS OF AMARILLO LICENSE, L.P. AND HIGH PLAINS
WIRELESS, L.P. TO COMMENTS OF NENA, APCO AND NASNA**

Amarillo License, L.P. ("Amarillo") and High Plains Wireless, L.P. ("High Plains"), by their attorneys, hereby reply to the "Comments of NENA, APCO and NASNA" submitted on September 11, 2002, regarding the "Request for Modification of Deadlines" on implementation of Enhanced 911 Phase II automatic location identification submitted by Amarillo and High Plains on August 9, 2002.

In their comments, the National Emergency Number Association ("NENA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Association of State Nine One One Administrators ("NASNA") (collectively, "Public Safety Organizations") accused Amarillo and High Plains of filing a "woefully tardy" request, and suggested that the Amarillo and High Plains be referred to the Enforcement Bureau.

Amarillo and High Plains strongly object to the Public Safety Organizations' characterization of the Amarillo and High Plains request. The Public Safety Organizations

seemingly failed to consider page 2 of the request from Amarillo and High Plains, for page 2 contained the following paragraph:

On June 26, 2002, Amarillo and High Plains received a request for E911 Phase II service from the Potter-Randall County Emergency Communication District (the “Local PSAP”). Amarillo and High Plains intend to utilize a network-based location technology. Pursuant to Section 20.18(f) of the Commission’s rules, Amarillo and High Plains are required to provide E911 Phase II service to 50 percent of their respective coverage areas within six months, or by December 26, 2002 and to 100 percent of their respective coverage areas within 18 months, or by December 26, 2003.

This paragraph obviously demonstrates that, pursuant to section 20.18(f) of the Commission’s Rules, the first compliance date for Amarillo and High Plains is not until December 26, 2002. In other words, Amarillo and High Plains submitted their request to extend the deadline more than four months in advance of the deadline. Amarillo and High Plains respectfully submit that no possible reading of any Commission requirement relating to E911 Phase II could describe a request to extend a deadline submitted more than four months in advance of the deadline to be “woefully tardy.”

In view of the foregoing, Amarillo and High Plains respectfully request that the Commission (1) make no referral of Amarillo and High Plains to the Enforcement Bureau, and (2) process and grant the August 9, 2002 request for modification of deadlines submitted by Amarillo and High Plains.

Respectfully submitted,

AMARILLO LICENSE, L.P.
HIGH PLAINS WIRELESS, L.P.

/s/
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September 23, 2002

CERTIFICATE OF SERVICE

I, Brenda G. Scott, a secretary in the law firm of Swidler Berlin Shereff Friedman, LLP, hereby certify that on this 23rd day of September, 2002, caused a true and correct copy of the foregoing "Reply Comments of Amarillo License, L.P. and High Plains Wireless, L.P. Comments of NENA, APCO and NASNA" to be served by first-class United States mail, postage prepaid, upon:

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